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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF THEIR MOTION IN  
LIMINE NO. 24 AND WAYMO'S BRIEF  
IN OPPOSITION THERETO**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants' Administrative Motion to File Under  
7 Seal Portions of their Motion in Limine No. 24 and Waymo's Brief in Opposition Thereto (the  
8 "Administrative Motion"). The Administrative Motion seeks an order sealing highlighted portions of  
9 Defendants' Motion in Limine No. 24 ("Defendants' Motion"), Plaintiff Waymo LLC's Opposition to  
10 Defendants' Motion in Limine No. 24 ("Waymo's Opposition"), Exhibit 10 to Defendants' Motion,  
11 and Exhibits 2-4 to the Declaration of Jeff Nardinelli, as well as the entirety of Exhibits 8 and 12 to  
12 Defendants' Motion and Exhibit 1 to the Declaration of Jeff Nardinelli.

13 3. Defendants' Motion (portions marked in red boxes in version filed herewith), Exhibit  
14 10 thereto (portions highlighted in red in version filed herewith), Exhibits 8 and 12 thereto (entire  
15 documents), Waymo's Opposition (portions highlighted in green), and Exhibit 4 to the Declaration of  
16 Jeff Nardinelli (portions highlighted in green) contain, reference, and/or describe Waymo's highly  
17 confidential and sensitive business information. Such information includes details regarding  
18 Waymo's cost expenditures on developing its trade secrets and Waymo's internal revenue forecasts  
19 from the self-driving vehicle market. I understand that Waymo maintains this information as  
20 confidential. The public disclosure of this information would cause significant competitive harm to  
21 Waymo, as it would permit Waymo's competitors to gain a significant competitive advantage in the  
22 relevant market.

23 4. Exhibit 10 to Defendants' Motion (red highlighted portions in version filed herewith)  
24 and Exhibit 12 thereto (entire document) additionally contain, reference, and/or describe Waymo's  
25 trade secret information. The information Waymo seeks to seal includes the confidential design and  
26 functionality of Waymo's proprietary autonomous vehicle system, including its LiDAR designs,  
27 which Waymo maintains as secret. I understand that these designs are maintained as secret by  
28 Waymo (Dkt. 25-47) and that the designs are valuable to Waymo's business (Dkt. 25-31). The public

1 disclosure of this information would give Waymo's competitors access to descriptions of the  
2 functionality or features of Waymo's autonomous vehicle system. If such information were made  
3 public, I understand that Waymo's competitive standing would be significantly harmed.

4 5. Waymo's request to seal is narrowly tailored to those portions of Defendants' Motion  
5 and Exhibits 8, 10, and 12 thereto, as well as those portions of Waymo's Opposition and Exhibit 4 to  
6 the Declaration of Jeff Nardinelli that merit sealing.

7  
8 I declare under penalty of perjury under the laws of the State of California and the United  
9 States of America that the foregoing is true and correct, and that this declaration was executed in San  
10 Francisco, California, on September 18, 2017.

11 By /s/ Felipe Corredor

12 Felipe Corredor

13 Attorneys for WAYMO LLC

14  
15 **ATTESTATION**

16 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
17 document has been obtained from Felipe Corredor.

18  
19 By: /s/ Charles K. Verhoeven

20 Charles K. Verhoeven